

Writer's Direct Dial:

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January 5, 2022

Via ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Tenenbaum v. Heritage Equity Holdings, LLC, et al
Case No.: 1:21-cv-5781 (FB) (TAM)

Dear Judge Merkl:

We are counsel to defendants Heritage Equity Holdings, LLC, The Williamsburg Hotel BK, LLC and Michael Lichtenstein (“Defendants”) in this matter and write pursuant to Rule 2(A) of Your Honor’s Individual Rules and Practices to respectfully request an extension of time to respond to the Complaint to January 21, 2022. This is the third request for an extension of time to respond to the Complaint and is made with Plaintiff’s consent.¹

Defendants’ response to the Complaint is currently due January 7, 2021. The extension is requested to enable our law firm to continue its review the allegations contained in the Complaint and provide a complete and accurate response, efforts which have been slightly delayed by the recent holiday period and uptick in COVID-19 issues. Accordingly, Defendants respectfully request to respond to the Complaint by January 21, 2022.

Thank you for your consideration and assistance.

Respectfully submitted,

/s/ Andrew T. Williamson
Andrew T. Williamson

CC: all counsel of record (by ECF)

¹ The first request was initially addressed to District Judge Block who directed Defendants to re-file the application addressed to Your Honor.